REMARKS

These remarks, submitted in response to the Office Action dated October 18, 2006, are believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-31 are all the claims pending in the application.

I.   Claim Rejections under 35 U.S.C. § 102

Claims 1-9, 11-19, 21-29 and 31 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Jacobs (U.S. Patent No. 6,710,786). Applicants respectfully traverse the rejection since Jacobs does not disclose all the limitations in the claims in as complete detail as recited in the claims.

For example, Claim 1 recites an input object that contains input data and one input function. Claim 1 further recites that the one input function comprises computer-implemented programming instructions.

Applicants submit that Jacobs does not teach or suggest an input object that contains both input data and an input function that comprises computer-implemented programming instructions. The Examiner asserts that the browser request in the form of a URL of Jacobs teaches the input object **and** the input function **comprising computer-implemented programming instructions**. The Examiner further asserts that computer-implemented programming instructions are taught by Jacobs at column 2, lines 52-63. However, this aspect of Jacobs merely discloses that the <u>browser request</u>, the aspect cited as the input function, is

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RESPONSE UNDER 37 C.F.R. § 1.116
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processed by the receiving entity, but does not teach that the browser request itself comprises computer-implemented programming instructions.

Applicants respectfully submit that Jacobs does not teach that the cited browser request **contains computer-implemented programming instructions**. Rather, Jacobs merely discloses that a **browser request identifies a predefined operation contained on the receiving entity**. (Jacobs, Col. 8, Ln. 65-67). The predefined operations contained on the receiving entity are referred to as cartridges, "modules of code for performing specific application or system functions." (Jacobs, Col. 7, Ln. 48-59). As such, Applicants respectfully submit that Jacobs **does not teach** that the browser request, the aspect cited as the input object, **contains** the operations to be performed by a programming entity. This is because the browser request merely identifies the predefined modules of code contained, not in the input object, but rather on the receiving entity. Further, Jacobs does not disclose the browser request containing an input function comprising computer-implemented programming instructions, as required by claim 1.

On page 7 of the Office Action, in responding to the distinctions between the claims and Jacobs pointed out by Applicant, the Examiner now asserts that the "state information" of Jacobs discloses at, col. 2, line 52 to col. 3, line 30, the claimed feature that an "input function comprises computer-implemented programming instructions." Specifically, the Examiner asserts that the client request contains state information that instructs the server of where to start or resume an operation, and as such, somehow reads on the claimed computer-implemented programming instructions. As discussed above, Jacobs merely discloses that the browser request (input function as cited by the Examiner) contains a URL that was previously provided to the

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server and which contains state information. Applicant respectfully submits that a person of

ordinary skill in the art would not confuse state information with programming instructions.

According to Jacobs, the state information includes the identity of the client, the ID and status of

the operation, what has transpired in the operation and connect information associated with the

operation. (Jacobs, Col. 3, Ln. 1-30). These types of data are not programming instructions.

Jacobs' browser request which is transmitted over the Internet from a client to a listener is then

passed to a dispatcher which communicates with a virtual path manager to identify a cartridge

selected by the browser request. (Jacobs, Col. 7, Ln. 5-25). However, the Examiner has not

established that such a request contains **computer-implemented programming instructions** as

claimed. Clearly the "state information" Jacobs discloses are not programming instructions.

For at least the above reasons, Claim 1 and its dependent claims are not anticipated by

Jacobs and should be deemed allowable. Since Claims 11 and 21 recite similar elements, Claims

11 and 21 and their dependent claims should also be deemed allowable for at least the same

reasons.

Claim 7

Claim 7 recites "wherein the step of receiving comprises receiving a plurality of input

objects, wherein each received input object contains an input function, and wherein each input

function has **a predefined signature**."

The Examiner asserts that the state information of a browser request teaches the claimed

predefined signature. However, contrary to the Examiner's assertion, the state information is

continually modified according to the operations being performed by the client. (Jacobs, Col. 3,

Ln. 5-15). Consequently, Jacobs does not teach a <u>predefined</u> signature as claimed. Therefore,

claim 7 should be deemed allowable.

II.   Rejection of Claims 10, 20 and 30 under § 103(a)

Claims 10, 20 and 30 have been rejected under 35 U.S.C. § 103(a) as being unpatentable

over Jacobs in view of Nakai (USP 6,253,248). Claims 10, 20 and 30 should be deemed

allowable by virtue of their dependency to claims 1, 11 and 21 for the reasons set forth above,

since Nakai does not cure the deficiencies of Jacobs.

III.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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